

RE: questions

From: s.38 [REDACTED]@pco-bcp.gc.ca>
To: s.38 [REDACTED] (FINTRAC/CANAFE)" <s.38 [REDACTED]@fintrac-canafe.gc.ca>
Cc: s.38 [REDACTED] (FINTRAC/CANAFE)" <s.38 [REDACTED]@fintrac-canafe.gc.ca>
Date: Mon, 14 Feb 2022 18:19:57 +0000

Sounds good, thanks.

~

From: s.38 [REDACTED] (FINTRAC/CANAFE) s.38 [REDACTED]@fintrac-canafe.gc.ca>
Sent: Monday, February 14, 2022 1:16 PM
To: s.38 [REDACTED]@pco-bcp.gc.ca>
Cc: s.38 [REDACTED] (FINTRAC/CANAFE) <s.38 [REDACTED]@fintrac-canafe.gc.ca>
Subject: RE: questions

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Protected B

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Hi Tony,

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Below are the main points assembled. Hope they are of use and happy to discuss.

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Crowdfunding

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- ~ (U) Of note, GiveSendGo is a Christian crowdfunding site that was involved in financing for the January 6th insurrection at the US Capitol. Similar to the first campaign, this crowdfunding campaign included donations from anonymous donors, and no identity verification for the public-facing names of donors.
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- ~ (U) As well, at least two Bitcoin fundraisers have been established for the protest and organizers have solicited direct donations through EMTs to the address, which is likely a source of funds for the protest.
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- ~ (U) As well, limited funds have been raised in the form of non-fungible tokens (NFTs), listed on a blockchain explorer with the label "#FREEDOMCONVOY22". These newly minted NFTs are being sold for up to 0.1 Ether coins at a time, or \$399.15 CAD.

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Reporting to FINTRAC

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- ~ (Prot. B) Reporting entities (e.g., bank, virtual currency exchanges, money services businesses) must submit a Suspicious Transaction Report to FINTRAC in respect of a financial transaction that occurs or is attempted, and for which there are reasonable grounds to suspect that the transaction is related to the commission or attempted commission of a money laundering or terrorist activity financing offence. These have no monetary threshold. To date, Suspicious Transaction Reporting related to the convoy and its protests has been limited and informed by adverse media reporting.

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Crowdfunding Non-Profit Organization

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- ~ (U) Since the suspension of the initial GoFundMe crowdfunding campaign, the organizers of the Freedom Convoy have established a separate GiveSendGo campaign. As per the

GiveSendGo campaign, the funds raised were to be dispersed to a registered not-for-profit corporation, Freedom 2022 Human Rights and Freedoms.

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- ~ (U) The purpose of the not-for-profit corporation, as listed in its articles of incorporation, is: Advocacy against government, agents of government and any other organization person or individuals' actions, laws, policies and practices that violate human rights and freedoms paying special attention to creation of class systems through mandates, social credit systems (rewards and punishments for government compliance), passport systems and more.

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OSINT Observations of convoy-related cryptocurrency fundraising

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- ~ (U/FOUO) Crowdfunding for the Trucker Convoy on the blockchain began as early as January 28th 2022. Funds were pooling in one of the main wallets, a Tallycoin address (bc1qlc2gpmzrr9gded07d9a40lt2lq7pp2v7h4c5jx) until the February 9th when the first withdrawals from the wallet were observed. The peak balance in the address was approximately 11.5 Bitcoin (\$621,000 CAD) before the funds were withdrawn to other addresses and distributed to separate address. To date, the tally coin address and campaign has sourced almost \$1.12million CAD across approximately 2,200 separate deposits.

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- ~ (U/FOUO) Since the Tallycoin main address began distributing its funded contents on Feb 9th 2022, \$1.1mil CAD has been withdrawn from the main tallycoin address across 16 different withdrawals to various wallets.
 - o~ The majority of the addresses were given approximately 1 bitcoin from the original address, currently valued at about \$54,000 CAD. One of the addresses has gotten up to 5 bitcoin which is worth approximately \$225,000 CAD.

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s.38

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- ~ (U/FOUO) The primary Tallycoin wallet is still receiving bitcoin donations as of Feb 14th 2022. These are now being disbursed quickly, rather than accumulating to a large balance and currently contains approximately 0.61 bitcoin, or approximately \$35,000 CAD.

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- o~ (Prot. B) Generally, IMVE threat actors in Canada have been known to use virtual currencies to fund their activities. There is a growing use of cryptocurrency by IMVE threat actors, specifically by cross-border networks and organized groups. These threat actors typically send and receive funds to and from cryptocurrency exchange platforms, which have an obligation to report designated financial transactions to FINTRAC.
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- o~ (Prot. B) In some cases, individuals suspected of engaging in IMVE activity used cryptocurrency exchanges and their personal banking accounts to facilitate the flow of funds within the financing network.
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- o~ (Prot. B) The use of cryptocurrency by cross-border networks and organized groups could allow IMVE threat actors to raise significantly larger amounts of funds that would otherwise raise suspicions if conducted through regular personal or business banking accounts.
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- o~ (Prot. B) The GiveSendGo campaign indicated that funds will be dispersed to a registered not-for-profit corporation, Freedom 2022 Human Rights and Freedoms. s.38
- s.38
- ~
- o~ (Prot. B) The use of corporate structures and new technologies such as cryptocurrency and NFTs points to a high level of understanding of regulatory oversight in Canada and the sophistication of the organizers of the Freedom Convoy.

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From: s.38 (FINTRAC/CANAFE)
Sent: February 14, 2022 12:35 PM
To: s.38 @pco-bcp.gc.ca>
Cc: s.38 (FINTRAC/CANAFE) s.38 @fintrac-canafe.gc.ca>
Subject: RE: questions

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I can provide you a bit more than that to pick from. Give us 15 minutes. ☺

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From: s.38 @pco-bcp.gc.ca>
Sent: February 14, 2022 12:33 PM
To: s.38 (FINTRAC/CANAFE) s.38 @fintrac-canafe.gc.ca>
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Does this make sense ?

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- Our understanding of the financial flows in support of FC 22 is limited. We do not have the data to determine the precise amounts, nor the exact origin, of foreign sources of funding. According to unverified information leaked from crowdfunding site Give Send Go, a number of individuals (almost 56%) from the USA are providing some financial support to the FC 22.

- At the aggregate level, we believe that most financial transactions are small amounts. FINTRAC has not reported any suspicious transactions reports related to external sources of financing.

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From: s.38 (FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca>
Sent: Monday, February 14, 2022 10:57 AM
To: s.38 <s.38@pco-bcp.gc.ca>
Cc: s.38 (FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca>
Subject: RE: questions

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Good morning,

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We certainly can. Will come back to you later today with a bit of a summary of what we're seeing on the financing side through the OSINT. Our own reporting received from reporting entities is, to my knowledge, limited—likely a factor of the requirement that reporting entities meet a reasonable grounds to suspect that a transaction relates to a money laundering or terrorist activity financing offence as well as any lag in reporting. We'll try to have a line or two on that as well.

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s.38

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From: s.38 <s.38@pco-bcp.gc.ca>
Sent: February 14, 2022 6:54 AM
To: s.38 (FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca> s.38
(FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca>
Subject: questions

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Morning colleagues,

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Hope you are well...

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IAS has been tasked to provide analytical support (still TBC) to some of the work related to the demonstrations. At this stage, I'm trying to baseline who is doing what... and what info is being fed to the GOC...

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As such, I'd be grateful if could copy me on any material – class or unclass – you end up producing.

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At the aggregate level, is there anything helpful you can tell about financing ?

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Cheers & please let me know if you have any questions.

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